

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) CRIMINAL NO. 04-10114-DPW
v.)
1. ANTONIO CARDONA,) VIOLATIONS:
a/k/a "ANT," and) 21 U.S.C. § 846 -- Conspiracy
) to Distribute Cocaine Base
2. JEROME LASSITER,) 21 U.S.C. § 841(a)(1) --
a/k/a "BUTTA,") Distribution of Cocaine
) Base
Defendants.) 18 U.S.C. § 2 --
) Aiding and Abetting
) 21 U.S.C. § 860(a) - Playground
) Zone Violation
) 21 U.S.C. § 861(a) - Use of a
) Juvenile

SUPERSEDING INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy to Distribute
Cocaine Base; 21 U.S.C. § 860(a) -- Playground
Zone Violation)

The Grand Jury charges that:

On or about June 19, 2003, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally combine,
conspire, confederate and agree with each other to possess with
intent to distribute, and to distribute, a quantity of cocaine
base, also known as "crack," a Schedule II controlled substance,
within 1,000 feet of the real property comprising the Little
Scobie Playground, in violation of Title 21, United States Code,

Sections 841(a)(1), 841(b)(1)(C) and 860(a).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about June 19, 2003, at Boston, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation)

The Grand Jury further charges that:

On or about July 1, 2003, at Boston, in the District of Massachusetts,

1. **JEROME LASSITER, a/k/a "BUTTA,"** defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a).

COUNT FOUR: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 21 U.S.C. § 861(a) -- Use of a Juvenile)

The Grand Jury further charges that:

On or about July 23, 2003, at Boston, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT,"

defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground and, in so doing, defendant, being a person at least eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce and entice a person, who was then under eighteen years of age, to violate Title 21, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 860(a) and 861(a).

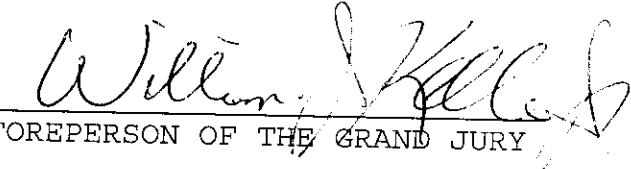
Notice Of Additional Factors

The Grand Jury further charges that:

1. Defendant Antonio Cardona, a/k/a "Ant," is responsible for at least 1, but less than 2, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c) (11) applies to this defendant.

2. Defendant Jerome Lassiter, a/k/a "Butta," is responsible for at least 2, but less than 3, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c) (10) applies to this defendant.

A TRUE BILL



FOREPERSON OF THE GRAND JURY



ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS: October 28, 2004

Returned into the District Court by the Grand Jurors and
filed.

DEPUTY CLERK

Criminal Case Cover SheetU.S. District Court - District of MassachusettsPlace of Offense: Category No. II Investigating Agency DEACity Boston**Related Case Information:**County SuffolkSuperseding Ind./ Inf. X Case No. 04-10114-DPWSame Defendant X New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name Antonio Cardona Juvenile: Yes NoAlias Name AntAddress 93 River Street, Mattapan, MABirthdate: 1983 SS # -0384 Sex: Male Race Hispanic Nationalit USDefense Counsel if known: Edward P. Ryan, Jr. Address 61 AcademyBar Number _____ Fitchburg, MA 01420**U.S. Attorney Information:**AUSA Patrick M. Hamilton Bar Number if applicable _____Interpreter: Yes No List language and/or dialect: _____Matter to be SEALED: Yes NoWarrant Requested Regular Process In Custody**Location Status:**Arrest Date April 15, 2004X Already in Federal Custody as of 4/15/04 in PlymouthAlready in State Custody Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: _____ on _____Charging Document: Complaint Information IndictmentTotal # of Counts: Petty _____ Misdemeanor _____ Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 28, 2004 Signature of AUSA Patrick M. Hamilton

Signature of AUSA

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Antonio Cardona**U.S.C. Citations****Index Key/Code****Description of Offense Charged****Count Numbers**Set 1 21 U.S.C. §§ 846Conspiracy to distribute cocaine base in a
playground zone1Set 2 21 U.S.C. § 841(a)(1)Distribution of cocaine base in a playground zone2 and 4

and 860(a)

Set 3 18 U.S.C. § 2Aiding and abetting2Set 4 21 U.S.C. § 861(a)Use of a juvenile in a drug offense4

Set 5 _____

Set 6 _____

Set 7 _____

Set 8 _____

Set 9 _____

Set 10 _____

Set 11 _____

Set 12 _____

Set 13 _____

Set 14 _____

Set 15 _____

ADDITIONAL INFORMATION:

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: Category No. II Investigating Agency DEACity Boston**Related Case Information:**County SuffolkSuperseding Ind./ Inf. X Case No. 04-10114-DPWSame Defendant X New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name Jerome Lassiter Juvenile: Yes NoAlias Name ButtaAddress 53 Ashton Street, #1, Dorchester, MABirthdate: 1984 SS # 0739 Sex: Male Race African-American Nationalit USDefense Counsel if known: John H. Cunha, Jr. Address One State StreetBar Number _____ Boston, MA 02109**U.S. Attorney Information:**AUSA Patrick M. Hamilton Bar Number if applicable _____Interpreter: Yes No List language and/or dialect: _____Matter to be SEALED: Yes NoWarrant Requested Regular Process In Custody**Location Status:**Arrest Date 4/15/04X Already in Federal Custody as of 4/15/04 in PlymouthAlready in State Custody Serving Sentence Awaiting Trial On Pretrial Release: Ordered by: _____ on _____Charging Document: Complaint Information IndictmentTotal # of Counts: Petty Misdemeanor Felony 3

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 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 28, 2004 Signature of AUSA: 

Patrick M. Hamilton

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Jerome Lassiter

U.S.C. Citations

Index Key/Code

Description of Offense Charged

Count Numbers

Set 1 21 U.S.C. §§ 846

Conspiracy to distribute cocaine base in a
playground zone

1

Set 2 21 U.S.C. § 841(a)(1)

Distribution of cocaine base in a playground zone

2 and 3

Set 3 18 U.S.C. § 2

Aiding and abetting

2

Set 4 _____

Set 5 _____

Set 6 _____

Set 7 _____

Set 8 _____

Set 9 _____

Set 10 _____

Set 11 _____

Set 12 _____

Set 13 _____

Set 14 _____

Set 15 _____

ADDITIONAL INFORMATION: _____
